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July 17, 2020

BY EMAIL

Hon. Naomi R. Buchwald
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Alberto Rivera, 1:18-CR-847 (NRB)

Dear Judge Buchwald:

Pursuant to Your Honor's Individual Practices, we write on behalf of Defendant Alberto Rivera to request confidential treatment for certain documents and references to those documents to be submitted in connection with Mr. Rivera's Emergency Motion for Compassionate Release.

Mr. Rivera recognizes the strong presumption of access that attaches to judicial documents. *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 121 (2d Cir. 2006) ("[A] strong presumption of access attaches" to judicial documents "under both the common law and the First Amendment"). Accordingly, Mr. Rivera's sealing request is limited to information contained in his extensive medical records that relate to issues other than his hip condition and documents that reflect the confidential information contained in his medical records. *See United States v. Sattar*, 471 F. Supp. 2d 380, 388 (S.D.N.Y. 2006) (allowing redaction of certain highly personal information in psychological report where such information was extraneous to sentencing and therefore "would not promote any of the values associated with public scrutiny of the sentencing process").

Highlighted copies of the aforementioned documents that reflect these proposed redactions are attached (Brief and Exhibits B, D, and F).

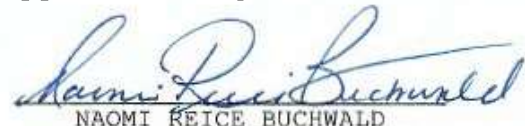
Respectfully submitted,

/s/ Justin W. Lamson
Justin W. Lamson

Attachments

cc: All counsel of record by email

Application granted.



NAOMI REICE BUCHWALD

UNITED STATES DISTRICT JUDGE

Date: July 20, 2020